

Robert A. Sacks (CSB No. 150146)
(sacksr@sullcrom.com)

SULLIVAN & CROMWELL LLP
1888 Century Park East, Suite 2100
Los Angeles, California 90067
(310) 712-6600 (telephone)
(310) 712-8800 (facsimile)

Laura Kabler Oswell (SBN 241281)
(oswelll@sullcrom.com)

SULLIVAN & CROMWELL LLP
1870 Embarcadero Road
Palo Alto, California 94303
Telephone: (650) 461-5600
Facsimile: (650) 461-5700

Attorneys for Intervenor Thomson
Consumer Electronics, Inc. and
Thomson S.A. (Specially Appearing)

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Case No. 07-5944-SC

MDL No. 1917

This Document Relates to:

ALL INDIRECT PURCHASER ACTIONS.

**[PROPOSED] REPORT AND
RECOMMENDATION DENYING
INDIRECT PURCHASER PLAINTIFFS'
MOTION TO FOR
LEAVE TO AMEND COMPLAINT**

Date: September 27, 2012

Time: 1:00 p.m.

JAMS: Two Embarcadero Center, Suite 1500

Judge: Hon. Samuel Conti

Special Master: Hon. Charles A. Legge (Ret.)

**[OPPOSITION; AND DECLARATION OF
LAURA KABLER OSWELL FILED
CONCURRENTLY HEREWITH]**

To the Honorable Samuel Conti, United States District Judge:

On August 22, 2012, Indirect Purchaser Plaintiffs' filed their Motion for Leave to Amend the Complaint (Dkt. No. 1235) (the "Motion to Amend"). In the Motion to Amend, Plaintiffs seek to add Thomson Consumer Electronics, Inc. and Thomson S.A. (collectively, "Thomson") as defendants in this action. On September 14, 2012 Thomson Consumer Electronics, Inc. moved to intervene and, with Thomson S.A., specially appearing, filed their Opposition to the Motion to Amend.

Having carefully considered the briefs and other submissions of the parties, as well as oral arguments by counsel at the hearing, the Special Master recommends that the Motion to Amend should be DENIED as to Thomson.

DATED: _____

Hon. Charles A. Legge
United States District Judge (Ret.)
Special Master

The Report and Recommendations are Accepted and Ordered / Denied / Modified.

DATED: _____

Hon. Samuel Conti
United States District Judge